

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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TOM GONZALES and BIRCH VENTURES :
LLC, : No. 11-CIV-1435 (BSJ)
Plaintiffs, :
: ECF Case
v. :
NATIONAL WESTMINSTER BANK PLC, :
: Defendants.
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**DISCLOSURE STATEMENT OF DEFENDANT
NATIONAL WESTMINSTER BANK PLC PURSUANT TO FRCP 7.1**

Defendant National Westminster Bank Plc makes the following disclosures pursuant to Federal Rule of Civil Procedure 7.1.

1. Identify all parent corporation(s).

National Westminster Bank Plc is a wholly-owned subsidiary of The Royal Bank of Scotland plc, which is a wholly-owned subsidiary of The Royal Bank of Scotland Group plc, a public limited company organized under the laws of the United Kingdom.

2. List any publicly-held company that owns 10% or more of the party's stock.

National Westminster Bank Plc is a wholly-owned subsidiary of The Royal Bank of Scotland plc, which is a wholly-owned subsidiary of The Royal Bank of Scotland Group plc, a public limited company organized under the laws of the United Kingdom.

Dated: New York, New York
May 23, 2011

SCHULTE ROTH & ZABEL LLP

By: /s/ Michael Swartz

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